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March 22, 2021

**BY CM/ECF**

Honorable Jesse M. Furman  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Juan B. Pujol Moreira, et al. v. Société Générale, S.A., et al.*, No. 20-cv-9380-JMF (“*Pujol I*”)  
*Juan B. Pujol Moreira v. Société Générale, S.A., et al.*, No. 21-cv-2283-JMF (“*Pujol II*”)

Dear Judge Furman,

This firm represents defendant BNP Paribas (“BNPP”) in the above-referenced actions. On behalf of BNPP and defendant Société Générale, S.A. (“SG,” together “Defendants”), we write pursuant to the Court’s Order in *Pujol I* dated March 17, 2021 (ECF No. 39-9380).<sup>1</sup>

Defendants do not intend to oppose Plaintiffs’ motion to consolidate the above referenced actions, reserving all rights, defenses, and grounds for dismissal with respect to the amended complaint in *Pujol I* and the complaint in *Pujol II*, including without limitation those grounds set forth in Defendants’ motion to dismiss filed March 19, 2021 (ECF No. 40-9380) in *Pujol I*.

In addition, to avoid any dispute as to the propriety or adequacy of service on Defendants of the *Pujol II* complaint, the parties have agreed, subject to approval of the Court, to the following:

1. Defendants accept service of the complaint (ECF No. 11-2283) in *Pujol II*;

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<sup>1</sup> Docket entries in *Pujol I* are cited as “-9380.” Docket entries in the case *Pujol II* are cited as “-2283.”

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2. After the cases are consolidated, the deadline for Defendants to answer or file a motion to dismiss the complaint filed in *Pujol II* (ECF No. 11-2283) will be stayed through and including the date of a decision on the motion to dismiss in *Pujol I* (ECF No. 40-9380);
3. After a decision on the motion to dismiss in *Pujol I*, the parties will meet and confer in good faith regarding the most sensible way to move forward in *Pujol II* in light of the Court's decision.

The parties respectfully request the Court grant the relief requested by this letter-motion.

Respectfully Submitted,

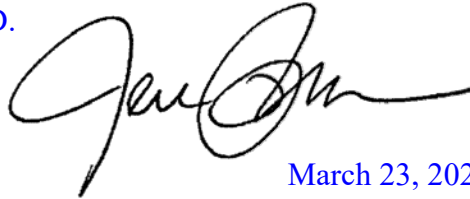
/s/ Carmine D. Boccuzzi, Jr.

Carmine D. Boccuzzi, Jr.

cc: Counsel of Record

The parties' proposal is ADOPTED and the motion to stay deadlines in 21-CV-2283 is GRANTED. As the above-captioned actions involve common questions of law and fact and the parties agree that consolidation is appropriate, it is hereby ORDERED that pursuant to Rule 42(a)(2) of the Federal Rules of Civil Procedure, they are consolidated under the case number 20-CV-9380. Future filings should be in 20-CV-9380 alone.

The Clerk of Court is directed to terminate 20-CV-9380, ECF No. 44. The Clerk is further directed to consolidate 20-CV-9380 and 21-CV-2283 under case number 20-CV-9380, and to close 21-CV-2283. SO ORDERED.



March 23, 2021